

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

JACQUELYN MARES, M.D.,

Plaintiff,

v.

MIAMI VALLEY HOSPITAL, et al.

Defendants.

)
) Civil Action No. 3:20-cv-00453
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) Judge Michael J. Newman
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DECLARATION OF KAREN T. DUNLEVEY, ESQ.

I, Karen T. Dunlevey, being first duly cautioned and sworn, and being more than age eighteen and competent to testify about the matters contained herein, hereby testify and state as follows:

1. I am a principal (partner) at Jackson Lewis PC.
2. I have personal knowledge of the facts stated in this Declaration.
3. I am counsel for defendants Miami Valley Hospital and Premier Health Partners (collectively, the "MVH Defendants") in the above-captioned litigation.
4. Attached as Exhibit A is a copy of the online docket for *Jacqueline Mares M.D. v. Miami Valley Hospital, et al.*, filed as case number 2019 CV 02921 in the Montgomery County, Ohio, Court of Common Pleas ("State Court Action").
5. I represented the MVH Defendants, as well as Dr. Teresa Zryd, in the State Court Action.
6. Attached as Exhibit B is a copy of the Complaint Plaintiff Jacqueline Mares, M.D., filed in the State Court Action.

7. Attached as Exhibit C is a copy of a motion for summary judgment the MVH Defendants and Dr. Zryd filed in the State Court Action.

8. Attached as Exhibit D is a copy of Plaintiff's Motion to Continue Date for Response to Defendants' Miami Valley Hospital, Premier Health Partners, and Teresa Zryd, M.D. Motion for Summary Judgment (Rule 56(F)) filed in the State Court Action.

9. Attached as Exhibit E is a copy of Plaintiff's Notice of Voluntary Dismissal filed in the State Court Action.

10. Other than in Exhibit D, at no time during the pendency of the State Court Action, or the above-captioned action, did Plaintiff seek any discovery from the MVH Defendants or Dr. Zryd.

11. I acknowledge that I have provided this declaration of my own free will, that I was not under any obligation to do so, and that I was not pressured to do so by any individual or entity.

I, Karen T. Dunlevey, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and accurate.



Karen T. Dunlevey



Date of Execution